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Counsel for Plaintiff
VIRAL DRM LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VIRAL DRM LLC,

Plaintiff,

v.

ANTON SHUBSTORSKY,

Defendant.

CASE NO.: 3:24-cv-00733-JSC

**DECLARATION OF MATTHEW L. ROLLIN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR DEFAULT JUDGMENT AGAINST
ANTON SHUBSTORSKY**

I, Matthew L. Rollin, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff VIRAL DRM LLC ("Viral DRM") in the above-captioned matter. I provide this Declaration in support of Viral DRM's Motion for Entry of a Final Default Judgment Against Defendant ANTON SHUBSTORSKY ("Shubstorsky" or "Defendant"). I have personal knowledge of the facts stated herein, and if called as a witness, I could and would testify competently to the matters set forth herein.

2. Shubstorsky has refused to answer, show up or otherwise respond in this case.

3. Injunctive relief is warranted because Shubstorsky has refused to respond to Counsel or the Court, and due to its lack of a response, there is a chance it could infringe again in the future.

1 4. For purposes of setting the post-judgment interest rate under 28 U.S.C. § 1961, the
2 average 1-year constant maturity Treasury yield through August 23, 2024, was 4.36 percent.
3 Attached as **Exhibit 2** is a true and correct copy of a table of current federal interest rates, which I
4 obtained from the Federal Reserve Board’s website at <https://www.federalreserve.gov/releases/h15/>
5 (printout of “Treasury Constant Maturities,” displaying “1-year Treasury constant maturity”). Also
6 attached at **Exhibit 3** is an explanation of how to obtain the information, from
7 <http://www.uscourts.gov/services-forms/fees/post-judgement-interest-rate>

8 5. My office caused a copy of Viral DRM’s Motion to be emailed to Shubstorsky on
9 August 27, 2024. Viral DRM has served Shubstorsky with its requested damage amount with its
10 counsel’s service of this motion on Shubstorsky.

11
12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

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15 Executed on August 27, 2024

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17 /s/ Matthew L. Rollin
18 Matthew L. Rollin
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